

# POMERANTZ LLP

Jonathan D. Park  
Of Counsel

May 23, 2024

**VIA ECF**

Honorable Vernon S. Broderick  
United States District Judge  
Southern District of New York  
United States Courthouse  
40 Foley Square  
New York, NY 10007

Re: *Armstrong v. Medical Properties Trust, Inc., et al.*, No. 1:23-cv-008597-VSB

Dear Judge Broderick:

I represent Lead Plaintiff Movant John Cuomo. The initial class action complaint in this matter asserts claims under the Securities Exchange Act of 1934 (“Exchange Act”) against Medical Properties Trust, Inc. and certain of its officers. ECF No. 1. Pursuant to Section 21D(a)(3) of the Exchange Act, as amended by the Private Securities Litigation Reform Act of 1995 (“PSLRA”), any member of the purported class could move to be appointed as lead plaintiff within sixty days after publication of notice. *See* 15 U.S.C. § 78u-4(a)(3)(A)(i). Notice was published on September 29, 2023. ECF No. 18-2. Thus, the deadline for lead plaintiff motions was November 28, 2023.

Mr. Cuomo timely filed a motion for an order (1) appointing him as Lead Plaintiff on behalf of the proposed class and (2) approving his selection of my firm as Lead Counsel for the proposed class. ECF Nos. 15-18. No competing motions were filed, and no party opposes Mr. Cuomo’s motion. *See* ECF No. 19 (notice of non-opposition).

For the reasons set forth in Mr. Cuomo’s moving papers, we respectfully request that the Court grant his unopposed motion. Should the Court do so, Mr. Cuomo shall serve an amended complaint or designate the initial complaint as operative within sixty days of his appointment, pursuant to the Court’s prior order. ECF No. 13.

I thank the Court for its attention to this matter.

Respectfully submitted,

/s/ Jonathan D. Park

Jonathan D. Park

cc: All counsel of record (via ECF)

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